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Federal Communications Commission
Office of the SecretaryBEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of

Petition of Southwestern Bell Telephone
Company to Amend Part 68 of the Commission's
Rules to Include Terminal Equipment Connected
to Basic Rate Access Services Provided via
Integrated Services Digital Network
Access Technology

93-268
RM-7815COMMENTS IN SUPPORT OF PETITION FOR RULEMAKING

The Ameritech Operating Companies¹ submit these comments in support of the Petition of Southwestern Bell Telephone Company ("Southwestern Bell") requesting the Commission to amend Part 68 of its Rules to include terminal equipment connected to two-wire Basic Rate Access interface provided by Integrated Services Digital Network ("ISDN") access technology.

Southwestern Bell is correct. ISDN Basic Rate Access ("BRA") service is now beyond the experimental stage. The American National Standards Institute ("ANSI") has approved standards for BRA ISDN. In anticipation of the continuing proliferation of ISDN services, the Companies wholeheartedly support the proposed amendments to Part 68 proffered by Southwestern Bell. Those provisions will appropriately extend Part 68's network protection to a service which the industry

¹ The Ameritech Operating Companies are: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Inc.

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anticipates will soon become very popular. Moreover, and conversely, the proposed rule changes will themselves complement the standardization process which will further encourage the proliferation of ISDN based services and CPE.

Southwestern Bell, however, also discusses the jack -- or physical connectivity -- aspects of ISDN BRA service. As Southwestern Bell correctly notes, the ANSI standard specifies an eight-position non-keyed jack.² In the standard, two positions are reserved for battery, two for power, two for optional features, and one each for the tip and ring connections to the service itself.³ Southwestern Bell states that the standard would require the adoption of a new registration jack which could be effected through the tariff alternative.⁴ The Ameritech Operating Companies, however, would request that the Commission do nothing to preclude local exchange carriers ("LECs") from offering connection to ISDN BRA through any other appropriate registered/tariffed jack.

Currently, the Companies offer ISDN BRA via a standard RJ-11 jack. Most ISDN compatible equipment can already accommodate such a connection. The Ameritech Operating Companies utilize the tip and ring leads specified for a RJ-11 jack to provide the tip and ring leads for ISDN BRA. Since the RJ-11 accommodates up to six "pin" positions, there will still remain additional positions to be associated with the unspecified options mentioned in the ANSI standard. However, since the Companies

² Petition at 7.

³ ANSI Standard T1.601-1988, draft revision T1E1. 4/91-004, Table 1, page 35.

⁴ 47 CFR Section 68.104(c).

have no immediate plans to utilize either the battery or the power positions, there is no need to require the provision of service via an eight-position jack.

Requiring a connection through an eight-position jack would also require a premises visit to change the standard network interface device in most embedded applications. This would be a very costly procedure, especially in the case of offering ISDN BRA in residence and small business applications. The Companies, therefore, strongly request the Commission to take no action that would compel such a costly and unnecessary program.

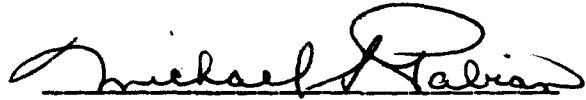
Moreover, it is not necessary to mandate an eight-position interface in order to assist equipment manufacturers in the standardization process. For those manufacturers who "build to" the eight-position interface, connection to a standard RJ-11 jack could be effected through a simple, inexpensive six-position to eight-position double-male adaptor. Alternatively, and perhaps more simply, manufacturers could equip their NT-1 devices with U interface receptacles that can accommodate either an eight-position connector or the standard six-position plug.⁵ The Companies would note that some manufacturers, including Northern Telecom, have already configured their equipment this way.

In all other respects, the Ameritech Operating Companies support the petition of Southwestern Bell and request that the Commission amend

⁵ See 47 CFR section 68.500(a). This is the standard telephone extension cord plug which also fits the standard RJ-11 jack.

Part 68 of its rules to include terminal equipment connected to two-wire ISDN BRA services.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael S. Pabian", written over a horizontal line.

Floyd S. Keene
Michael S. Pabian
Room 4H76
2000 W. Ameritech Center Drive
Hoffman Estates, IL 60195-1026
Attorneys for the Ameritech
Operating Companies

Dated: November 6, 1991

CERTIFICATE OF SERVICE

I, Jenell Thompson, do hereby certify that a copy of the
Comments in Support of Petition for Rulemaking has been mailed
this 6th day of November 1991, by first-class mail, postage prepaid,
to the party listed below.

By: Jenell Thompson
Jenell Thompson

Durward D. Dupre
Richard C. Hartgrove
Michael J. Zpevak
Thomas A. Pajda
Bruce E. Beard
Attorneys for Southwestern
Bell Telephone Company
1010 Pine Street, Room 2114
St. Louis, MO 63101